

**LOCAL BANKRUPTCY FORM 9013-3**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

Julio Lopez, Jr., and Benigna Lopez Guzman,

: **CHAPTER** 13

: **CASE NO.** 5 - 15 -bk- 04580

**Debtor(s)**

Atlas Acquisitions LLC,

: **ADVERSARY NO.** ap-  
**(if applicable)**

**Plaintiff(s)/Movant(s)**

**vs.**

Julio Lopez, Jr., and Benigna Lopez Guzman,

: **Nature of Proceeding:** Motion for Relief  
from Automatic Stay

**Defendant(s)/Respondent(s)**

: **Document #:** 55

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.<sup>2</sup>

Reason for the continuance.

Movant, Atlas Acquisitions LLC, and Debtors, Julio Lopez, Jr., and Benigna Lopez Guzman, have reached an agreement. Within 30 days hereof, Debtors shall file an Amended Chapter 13 Plan to include all post-petition arrearages and future post-petition payments into their Amended Chapter 13 Plan.

Movant requests a 30-day continuance of the hearing.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 3/8/18



Attorney for Movant, Alas Acquisitions LLC

Name: Charles N. Shurr, Jr., Esquire

Phone Number: 610-670-2552

<sup>1</sup> No alterations or interlineations of this document are permitted.

<sup>2</sup> If this is not a first request for a continuance, then a Motion to Continue must be filed.